



COUNTY OF OAKLAND

DANIEL T. MURPHY, COUNTY EXECUTIVE

January 2, 1986

Mr. Joseph D. Joachim
Director
Economic Development Group

Dear Mr. Joachim:

In response to your request and the Board of Commissioners resolution of December 12th, 1985 relative to our assessment of the Ethyl Corporation property located at 1600 W. Eight Mile Road, Ferndale, Michigan the following observations are offered:

1. Sufficient historical data relative to the useages and practices of all activities on the site have not been received by the Oakland County Environmental Health Services.
2. Visual observations as a result of on-site inspections by Environmental Health Services on December 10th and 14th, 1985 created concerns relative to previous waste disposal practices and site cleanup.
3. Sufficient data on background environmental quality data (i.e. land, air, water) are insufficient to establish the necessary base lines at this time.
4. As a result of conversations between Oakland County and their Consultant Neyer, Tiseo and Hindo Ltd., it appears that at least three areas of disposal contain metal objects. This was not a total site investigation but limited to the suspect disposal areas as indicated by the Ethyl Corporation.
5. Despite the contention by the Ethyl Corporation that no ground water contamination exists on this site. Environmental Health Services did not receive detailed background data on water quality analysis especially for organics and other commonly utilized compounds.

Due to the above five pertinent observations the Environmental Health Services offers the following recommendations:

1. Due to the extensive liability which would be encumbered by acceptance of this property by Oakland County, we recommend that Ethyl Corporation supply complete historical data for review by Oakland County prior to acceptance.
2. At the present time, Environmental Services has no documentation of environmental contaminants that would require additional cleanup. The fact that materials were buried in locations other than the indicated 13 dump sites on their property and they admonished us that future excavations should be made with the knowledge that the possibility of uncovering some contamination or an intact container would always remain.
3. In order to establish background quality data a detailed hydrogeologic study would need to be implemented before any acceptance of this property could be determined.
4. The aforementioned Hydrogeologic study would determine the extent and severity of the suspect disposal areas.
5. As part of the hydrogeologic study, complete water analysis should be included as well as the installation of additional monitoring wells that may be needed. (i.e. up gradient and down gradient)

In conclusion, we must adjudge the existing data to be inconclusive; as time did not offer sufficient opportunities to adequately perform all of the necessary testing. From the Environmental Health perspective acceptance of this property is not warranted.

Very truly yours,

OAKLAND COUNTY HEALTH DIVISION
DEPARTMENT OF INSTITUTIONAL AND
HUMAN SERVICES

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cc: Mr. Daniel T. Murphy-Oakland County Executive
Dr. Robert P. Locey - Health Director
The Honorable Richard Wilcox
Oakland County Board of Commissioners Members